

County of Kent

Michigan



Annual Action Plan

July 1, 2016 through June 30, 2017

An Element of the Consolidated Housing and Community Development Five-Year Strategic Plan

July 1, 2016 through June 30, 2021

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County of Kent

BOARD OF COMMISSIONERS BY DISTRICT

James R. Saalfeld, Chair
Shanna Shroll, Vice Chair

- | | |
|----------------------|----------------------------|
| 1 Theodore J. Vonk | 11 Jim Saalfeld |
| 2 Thomas Antor | 12 Harold Mast |
| 3 Roger C. Morgan | 13 Richard A. Vander Molen |
| 4 Diane Jones | 14 Carol M. Hennessy |
| 5 Mandy Bolter | 15 Jim Talen |
| 6 Stan Stek | 16 David Bulkowski |
| 7 Stan Ponstein | 17 Candace E. Chivis |
| 8 Harold J. Voorhees | 18 Dan Koorndyk |
| 9 Matt Kallman | 19 Shana Shroll |
| 10 Emily P. Brieve | |

FINANCE AND PHYSICAL RESOURCES COMMITTEE

Richard A. Vander Molen, Chair
Diane Jones, Vice Chair
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Matt Kallman
Roger C. Morgan
Stan Ponstein
Harold J. Voorhees

COUNTY ADMINISTRATION

Daryl J. Delabbio, County Administrator
Wayman P. Britt, Assistant County Administrator
Mary Swanson, Assistant County Administrator
Stephen W. Duarte, Fiscal Services Director

ANNUAL ACTION PLAN

Executive Summary - County of Kent Annual Action Plan - July 1, 2016 through June 30, 2017

A. HUD Urban County Community Development Block Grant Program (CDBG)

For 2016-2017, the County of Kent expects to accept its 35th annual CDBG entitlement grant from the U.S. Department of Housing and Urban Development (HUD) in the amount of \$1,400,992. Revenues of \$45,000 anticipated from program income from the Housing Rehabilitation Program will supplement the entitlement grant.

All cities, townships, and villages in Kent County are currently Participating Communities in the County of Kent's CDBG program, except for the cities of Grand Rapids and Wyoming, which operate their own entitlement CDBG programs. The City of Lowell opted out for 2016-2017. (The western half of the Village of Casnovia, which is located in Muskegon County, is also part of the County of Kent CDBG Program's jurisdiction.)

For 2016-2017, CDBG funds are budgeted for public facilities and improvements (general), parks and recreational facilities, street improvements, sidewalks, senior services, youth services, transportation services, owner-occupied housing rehabilitation loans, minor home repairs, accessible housing counseling/referral services, and general program administration.

Many CDBG-funded projects and programs will directly benefit only very low and low/moderate-income homeowners and residents, including seniors and the disabled. The remaining projects will benefit primarily residential areas that have a high concentration of low/moderate-income residents. These CDBG Target Areas are determined by HUD income standards, and have 39.8% or more of their residents classified by HUD as very low and low/moderate-income persons.

B. HUD HOME Investment Partnerships Program (HOME)

For 2016-2017, the County of Kent expects to accept its tenth annual HOME entitlement grant from the U.S. Department of Housing and Urban Development (HUD) in the amount of \$619,017. HOME-funded projects will be located within the 32 Participating Communities in the County of Kent's CDBG program. This includes the City of Wyoming.

For 2016-2017, HOME funds are budgeted for development of affordable housing and general program administration as outlined in the extended 6 year consolidated plan.

The HOME program requires a cumulative 25% non-federal cash or non-cash match to all grant funds expended, except for those spent on general program administration. Non-profit agencies will document appropriate match. No County of Kent general fund dollars or other grant dollars will be used to meet the HOME Match requirement.

C. ESG Emergency Solutions Grant

For 2016-2017 the County of Kent will accept its 3rd award of ESG funding in the amount of \$119,521. Funding will primarily be used for Rapid Re-Housing and Prevention.

FIVE-YEAR STRATEGIC PLAN

Executive Summary - County of Kent Housing and Community Development Five-Year Strategic Plan - July 1, 2016 through June 30, 2021

The County of Kent Housing and Community Development Five-year Strategic Plan (Consolidated Plan) for the planning period July 1, 2016 through June 30, 2021, identifies the needs, policies, strategies, and implementation programs to support the County's application for various housing and community development entitlement grants funded by the U.S. Department of Housing and Urban Development (HUD). County of Kent applications for the following HUD entitlement formula grants are facilitated by the submission of the Housing and Community Development Five-Year Strategic Plan (Consolidated Plan):

A. HUD Urban County Community Development Block Grant Program (CDBG)

For 2016-2017, the County of Kent will accept its 35th annual Urban County CDBG entitlement grant from the U.S. Department of Housing and Urban Development (HUD). Each year, revenues from program income and reprogrammed funds supplement the entitlement grant amount. The County will accept CDBG entitlement grants authorized by Congress in the subsequent program years of 2016-2017, 2017-2018, 2018-2019, 2019-2020, and 2020-2021 and (2011-2016 prior years) and the resulting Program Income.

All cities, townships, and villages in Kent County are currently Participating Communities in the County of Kent's CDBG program, except for the cities of Grand Rapids and Wyoming, which operate their own entitlement CDBG programs. The City of Lowell opted out for 2016-2017. (The western half of the Village of Casnovia, which is located in Muskegon County, is also part of the County of Kent CDBG Program's jurisdiction.)

B. HUD HOME Investment Partnerships Program (HOME)

For 2005-2006, the County of Kent accepted for the first time its annual HOME entitlement grant from the U.S. Department of Housing and Urban Development (HUD). A one-time matching grant of HUD HOME funds from the Michigan State Housing Development Authority (MSHDA), supplemented the County of Kent's first-year HOME entitlement grant. The County will accept HOME entitlement grants authorized by Congress in the subsequent program years of 2016-2017, 2017-2018, 2018-2019, 2019-2020 and 2020-2021 to include (2011-2016 prior years). Additionally, the application for the Kent County HOME consortium has been approved to include the City of Wyoming in Kent County's HOME allocation.

C. ESG Emergency Solutions Grant

For 2016-2017 the County of Kent will accept its 3rd award of ESG funding in the amount of \$119,521. Funding will primarily be used for Rapid Re-Housing and Prevention.



CPMP Non-State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

- | |
|-----------------------------------------------------------------------|
| <input type="checkbox"/> This certification does not apply. |
| <input checked="" type="checkbox"/> This certification is applicable. |

NON-STATE GOVERNMENT CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about --
 - a. The dangers of drug abuse in the workplace;
 - b. The grantee's policy of maintaining a drug-free workplace;
 - c. Any available drug counseling, rehabilitation, and employee assistance programs; and
 - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will --
 - a. Abide by the terms of the statement; and
 - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted --
 - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

8. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
9. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
10. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Signature/Authorized Official

Date

James R. Saalfeld

Name

Chair, Board of Commissioners

Title

County Administration Building
300 Monroe Ave NW

Address

Grand Rapids, MI 49503

City/State/Zip

616-632-7404

Telephone Number

- | | |
|-------------------------------------|-------------------------------------------|
| <input type="checkbox"/> | This certification does not apply. |
| <input checked="" type="checkbox"/> | This certification is applicable. |

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

11. **Maximum Feasible Priority -** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
12. **Overall Benefit -** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2__, 2__, 2__, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
13. **Special Assessments -** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

14. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
15. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K and R, of title 24;

Compliance with Laws -- It will comply with applicable laws.

Signature/Authorized Official

Date

James R. Saalfeld

Name

Chair, Board of Commissioners

Title

County Administration Building 300 Monroe
Ave, NW

Address

Grand Rapids, MI 49503

City/State/Zip

616-632-7404

Telephone Number

- ☒ This certification does not apply.
☐ This certification is applicable.

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities, which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- ☐ This certification does not apply.
☒ This certification is applicable.

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Signature/Authorized Official

Date

James R. Saalfeld

Name

Chair, Board of Commissioners

Title

County Administration Building,
300 Monroe Ave NW

Address

Grand Rapids, MI 49503

City/State/Zip

616-632-7404

Telephone Number

- ☒ **This certification does not apply.**
☐ **This certification is applicable.**

HOPWA Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official

Date

Name

Title

Address

City/State/Zip

Telephone Number

- | |
|-----------------------------------------------------------------------|
| <input type="checkbox"/> This certification does not apply. |
| <input checked="" type="checkbox"/> This certification is applicable. |

ESG Certifications

I, James R. Saalfeld, Chair, Board of Commissioners, certify that the local government will ensure the provision of the matching supplemental funds required by the regulation at 24 *CFR* 576.51. I have attached to this certification a description of the sources and amounts of such supplemental funds.

I further certify that the local government will comply with:

1. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grants are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services.
2. The building standards requirement of 24 *CFR* 576.55.
3. The requirements of 24 *CFR* 576.56, concerning assurances on services and other assistance to the homeless.
4. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable federal laws concerning nondiscrimination and equal opportunity.
5. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
6. The requirement of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.
7. The requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act of 1988.
8. The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted with ESG funds and that the address or location of any family violence shelter project will not be made public, except with written authorization of the person or persons responsible for the operation of such shelter.
9. The requirement that recipients involve themselves, to the maximum extent practicable and where appropriate, homeless individuals and families in policymaking, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 76.56.
10. The requirements of 24 *CFR* 576.57(e) dealing with the provisions of, and regulations and procedures applicable with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related

authorities as specified in 24 *CFR* Part 58.

11. The requirements of 24 *CFR* 576.21(a)(4) providing that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services will meet the requirements that: (A) the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) the assistance must not supplant funding for preexisting homeless prevention activities from any other source.
12. The new requirement of the McKinney-Vento Act (42 *USC* 11362) to develop and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that state and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of state and local resources.
13. HUD's standards for participation in a local Homeless Management Information System (HMIS) and the collection and reporting of client-level information.

I further certify that the submission of a completed and approved Consolidated Plan with its certifications, which act as the application for an Emergency Shelter Grant, is authorized under state and/or local law, and that the local government possesses legal authority to carry out grant activities in accordance with the applicable laws and regulations of the U. S. Department of Housing and Urban Development.

Signature/Authorized Official

Date

James R. Saalfeld

Name

Chair, Board of Commissioners

Title

County Administration Building
300 Monroe Ave NW

Address

Grand Rapids, MI 49503

City/State/Zip

616-632-7404

Telephone Number

- ☐ This certification does not apply.
- ☒ This certification is applicable.

APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant: Place of Performance (Street address, city, county, state, zip code) Check if there are workplaces on file that are not identified here. The certification with regard to the drug-free workplace is required by 24 CFR part 21.

Place Name	Street	City	County	State	Zip
Community Development Dept	82 Ionia Ave NW Suite 390	Grand Rapids	Kent	MI	49503
County Administration Building	300 Monroe Ave NW	Grand Rapids	Kent	MI	49503

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules: "Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15); "Conviction" means a finding of guilt (including a plea of *nolo contendere*) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the

Federal or State criminal drug statutes; "Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance; "Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

- a. All "direct charge" employees;
- b. all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and
- c. temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

Note that by signing these certifications, certain documents must be completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan

Signature/Authorized Official

Date

James R. Saalfeld

Name

Chair, Board of Commissioners

Title

County Administration Building
300 Monroe Ave NW

Address

Grand Rapids, MI 49503

City/State/Zip

616-632-7404

Telephone Number



SF 424

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.

SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

Date Submitted 5/2/16	Applicant Identifier	Type of Submission	
Date Received by state	State Identifier	Application	Pre-application
Date Received by HUD	Federal Identifier	<input checked="" type="checkbox"/> Construction	<input type="checkbox"/> Construction
		<input checked="" type="checkbox"/> Non Construction	<input type="checkbox"/> Non Construction
Applicant Information			
County of Kent		MI269081 KENT COUNTY	
82 Ionia Avenue, N.W.		Organizational DUNS: 187501866	
Suite 390		Organizational Unit	
Grand Rapids	Michigan	Department: Community Development	
49503-3036	U.S.A.	Division	
Employer Identification Number (EIN):		County: Kent	
38-6004862		07/01/2016	
Applicant Type:		Specify Other Type if necessary:	
Local Government: County		Specify Other Type	
Program Funding		U.S. Department of Housing and Urban Development	
Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding			
Community Development Block Grant		14.218 Entitlement Grant	
CDBG Project Titles: Public Facilities and Improvements (General), Senior Centers, Neighborhood Facilities, Parks and Recreational Facilities, Street Improvements, Sidewalks, Senior Services, Youth Services, Transportation Services, Minor Home Repairs, Moderate Rehabilitation, Rehabilitation Administration, Owner-occupied Housing Rehabilitation Loans, Fair Housing, Continuum of Care Homeless Administration and General Program Administration.		Description of Areas Affected by CDBG Project(s): County of Kent Urban County CDBG Program Participating Communities (32 cities, villages, and townships)	
CDBG Grant Amount: \$1,400,992	Additional HUD Grant(s) Leveraged: n/a	Describe: n/a	
Additional Federal Funds Leveraged: n/a		Additional State Funds Leveraged: n/a	
Locally Leveraged Funds: \$ 140,000		Grantee Funds Leveraged: \$200,000	
Anticipated Program Income: \$45,000		Other (Describe):	
Total Funds Leveraged for CDBG-based Project(s): \$ 1,785,992			

Home Investment Partnerships Program		14.239 HOME	
HOME Project Titles: Housing Rehabilitation, Infill Construction/Rehabilitation for Sale, Rental Unit Development, CHDO Support, Program Administration, Downpayment Assistance		Description of Areas Affected by HOME Project(s): County of Kent Urban County CDBG Program Participating Communities (32 cities, villages, and townships) plus city of Wyoming	
HOME Grant Amount: \$619,017	Additional HUD Grant(s) Leveraged: \$5,109,120	Describe: Continuum of Care (\$1,328,995) Housing Choice Voucher (\$3,598,256,) Family Self-Sufficiency (\$117,082)	
Additional Federal Funds Leveraged: n/a		Additional State Funds Leveraged: n/a	
Locally Leveraged Funds: \$140,000		Grantee Funds Leveraged: n/a	
Anticipated Program Income: n/a		Other (Describe): n/a	
Total Funds Leveraged for HOME-based Project(s): \$5,728,137			
Housing Opportunities for People with AIDS: n/a		14.241 HOPWA	
HOPWA Project Titles		Description of Areas Affected by HOPWA Project(s)	
\$HOPWA Grant Amount	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for HOPWA-based Project(s)			
Emergency Shelter Grants Program: n/a		14.231 ESG	
ESG Project Titles		Description of Areas Affected by ESG Project(s)	
\$ESG Grant Amount \$119,521	\$Additional HUD Grant(s) Leveraged	Describe	
\$Additional Federal Funds Leveraged		\$Additional State Funds Leveraged	
\$Locally Leveraged Funds		\$Grantee Funds Leveraged \$119,521	
\$Anticipated Program Income		Other (Describe)	
Total Funds Leveraged for ESG-based Project(s) \$239,042			
Congressional Districts of:		Is application subject to review by state Executive 12372 Process?	
2 nd & 3 rd	2 nd & 3 rd		
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		<input checked="" type="checkbox"/> Yes	This application was made available to state EO 12372 process for review on 05/02/2016
		<input type="checkbox"/> No	Program is not covered by EO 12372
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> N/A	Program has not been selected by the for review

Person to be contacted regarding this application

First Name: Matthew	Middle Initial:	Last Name: VanZetten
Title: Interim Housing & Community Development Director	Phone: (616) 632-7404	Fax: (616) 632-7405
eMail: matthew.vanzetten@kentcountymi.gov	Grantee Website: www.accesskent.com	Other Contact: Darrell Singleton, Community Development Manager (616) 632-7422
Signature of Authorized Representative		Date Signed

**NOTICE OF PUBLIC HEARING
AND
NOTICE OF PUBLIC AVAILABILITY**

**HOUSING AND COMMUNITY DEVELOPMENT
ANNUAL ACTION PLAN
AN ELEMENT OF THE EXTENDED FIVE-YEAR STRATEGIC PLAN
FOR JULY 1, 2016 - JUNE 30, 2021**



Public notice is hereby given that a draft of the proposed 2016-2017 Annual Action Plan element of the extended 2016-2021 Housing and Community Development Five-Year Strategic Plan, also known as the Consolidated Strategy and Plan, for the County of Kent, is now available for public inspection, review and comment. These plans are required by the U.S. Department of Housing and Urban Development (HUD) for participation in the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships (HOME) program, and the Emergency Solutions Grant (ESG) program.

The Annual Action Plan portion of the Consolidated Strategy and Plan is a planning and application document that attempts to identify those housing and community development programs and activities that are proposed to be undertaken in the County of Kent between July 1, 2016 and June 30, 2017 to meet the goals and objectives established in the extended five-year Housing and Community Development Strategic Plan which covers the period beginning July 1, 2016 and ending June 30, 2021.

The primary objectives of the County's extended five-year Housing and Community Development Strategy and Plan are as follows:

- a. Preserve and improve the existing housing stock occupied by low and moderate income persons.
- b. Provide affordable rental opportunities in decent, safe and sanitary housing to low income persons, particularly those having low and extremely low incomes.
- c. Improve and expand the public facilities and public services that augment and support the affordable housing stock.

- d. Promote and implement energy conservation measures in the affordable housing stock.
- e. Provide support services and homeless prevention activities for the homeless and those at risk of becoming homeless.
- f. Provide a variety of affordable rental housing choices for low income persons with special needs.

SUMMARY OF PROPOSED HOUSING AND COMMUNITY DEVELOPMENT ACTIVITIES

The approved extended 2016-2021 Consolidated Strategy and Plan sets forth the details of a number of activities that the County and others may undertake in an effort to achieve the objectives listed above. These proposed activities are funded by a number of funding sources, including federal, state, and local resources. Activities can occur anywhere within the County of Kent, except the City of Grand Rapids. In summary, the proposed activities include moderate and substantial housing rehabilitation, including energy-efficient work items for persons of low and moderate income, support to new construction and rental assistance activities for extremely low, low, and moderate income persons that may be undertaken by governmental or non-profit entities, limited assistance in the form of support services for extremely low income homeless persons and certain other activities intended to provide public facilities, improvements and services designed to benefit low and moderate income families and individuals. The County may support applications by other entities wishing to participate in federal and state programs for housing improvement and assistance, provided any such proposed projects are consistent with the five-year Consolidated Strategy and Plan.

Under the proposed 2016-2017 Annual Action Plan element of the Consolidated Strategy and Plan, the County of Kent expects to have \$2,235,849 available for the Community Development programs during the period July 1, 2016 through June 30, 2017. A CDBG entitlement grant is expected to be made available by HUD in the amount of \$1,520,513. Revenues of \$45,000 from program income are anticipated. The County of Kent also expects to receive a HOME entitlement grant in the amount of \$670,336, an Emergency Solutions Grant of approximately \$119,521, and \$1,328,995 for the Continuum of Care SHP (Shelter plus Care) Grant program. The authorized jurisdiction for the County's CDBG and ESG programs includes all of Kent County, except the cities of Grand Rapids and Wyoming, which operate their own distinct and separate CDBG and ESG programs. The authorized jurisdiction for the County's HOME program includes all of Kent County, except the City of Grand Rapids, which operates its own distinct and separate HOME program.

Under the CDBG program, funds must be used to give priority to carry out one of the broad national objectives as listed below:

1. Benefit to low and moderate income families; or

2. Aid in the prevention or elimination of slums or blight; or
3. Activities designed to meet other community development needs having a particular urgency because existing conditions pose a serious threat to the health or welfare of the community where other financial resources are not available to meet such needs.

For the CDBG, HOME, and ESG programs, the County of Kent proposes to pursue the following general objectives which will give maximum feasible priority to benefiting low and moderate income families:

1. To eliminate conditions that are detrimental to health, safety, and public welfare through housing rehabilitation and assistance; and
2. To expand and improve the quantity and quality of public and community facilities and improvements; and
3. To eliminate conditions detrimental to health, safety, and public welfare through public service assistance. This will be accomplished through the funding of public services that benefit low and moderate income persons; and
4. To improve accessibility to public facilities by the removal of architectural barriers; and
5. To retain and preserve properties of historical significance; and
6. To expand opportunities for affordable housing.

PROPOSED CDBG, HOME AND ESG ACTIVITIES AND USE OF FUNDS

CDBG - PUBLIC FACILITIES AND IMPROVEMENTS	546,130
CDBG - PUBLIC SERVICES	202,592
CDBG - HOUSING REHABILITATION	363,521
CDBG - GENERAL PROGRAM ADMINISTRATION	288,749
CDBG – PROGRAM INCOME	45,000
HOME - HOUSING PROGRAMS	603,303
HOME - GENERAL PROGRAM ADMINISTRATION	67,033
ESG – PREVENTION RAPID RE-HOUSING	119,521

TOTAL \$2,235,849

The proposed funding allocations are tentative and will not be firm until a grant agreement is tendered by HUD and executed by the County of Kent after approval of the proposed 2016-2017 Annual Action Plan element of the extended 2016-2021 Consolidated Strategy and Plan by the Kent County Board of Commissioners.

In conducting its HUD-funded programs, the County of Kent will make every effort to minimize involuntary and permanent displacement of residents. There are no plans to displace any residents as a result of HUD-assisted activities for the 2016-2017 program year. The County of Kent is, however, prepared to provide relocation benefits, including payment for replacement housing and reasonable moving expenses, to those residents found to be displaced as a result of one of its HUD-funded activities. Benefits and procedures for displacement would be carried out in conformance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

The public is invited to review and provide written comments on the proposed 2016-2017 Annual Action Plan element of the extended 2011-2016 Consolidated Strategy and Plan, including the proposed CDBG, HOME, ESG and Shelter plus Care (S+C) Program activities and uses of funds. The comment period commences on February 13, 2016 and will expire at 5:00 p.m. on March 30, 2016.

Copies of the proposed 2016-2017 Annual Action Plan element of the extended 2016-2021 Consolidated Strategy and Plan are available for public inspection and review at the following locations during normal business hours:

Kent County Community Development Department
82 Ionia Avenue NW, Suite 390
Grand Rapids, MI 49503-3036

Grand Rapids Public Library – Main Branch
Reference Desk
111 Library Street NE
Grand Rapids, MI 49503

www.accesskent.com

Public notice is also hereby given that the County of Kent will hold a public hearing on March 30, 2016 at 4:00 p.m. at the Community Development Department, 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503-3036 to provide opportunity for public review and comment on the County's proposed 2016-2017 Annual Action Plan element of the extended 2016-2021 Consolidated Strategy and Plan.

All written comments regarding the proposed 2016-2017 Annual Action Plan element of the extended 2016-2021 Consolidated Strategy and Plan that are received prior to 5:00 p.m. on March 30, 2016 will be considered and reviewed for possible inclusion in the final document that will be submitted to the U.S. Department of Housing and Urban Development. A summary of all comments received at the public hearing that was held on December 30, 2015, and that may be received at the public hearing to be held on March 30, 2016, will be attached to that final document.

For information regarding the proposed 2016-2017 Annual Action Plan element of the extended 2016-2021 Consolidated Strategy and Plan, please contact:

Matthew VanZetten, Interim Director
Kent County Community Development Department
82 Ionia Avenue NW, Suite 390
Grand Rapids, MI 49503-3036
Telephone: (616) 632-7404

This notice is officially dated February 13, 2016.

Jim Saalfeld, Chair
Kent County Board of Commissioners

NOTICE OF PUBLIC HEARING

on

HOUSING, COMMUNITY DEVELOPMENT and HOME NEEDS



Notice is hereby given that the Kent County Housing Commission and Community Development Department will hold a public hearing on Monday, December 28, 2015 at 4:00 p.m., at its offices at 82 Ionia Avenue NW, Suite 390 Grand Rapids, MI 49503, to provide opportunity for the public to submit perceptions of - and suggestions on - housing, community development, and HOME needs that should be considered by Kent County. The hearing fulfills requirements related to the preparation of Kent County's next annual element of the Five-Year Consolidated Plan and its eventual submission to the U.S. Department of Housing and Urban Development, for approval and funding.

In lieu of attending this public hearing, interested parties may submit written comments and suggestions, postmarked no later than December 28, 2015, and addressed to Kent County Housing and Community Development, 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503. Any questions may be directed to Linda S. Likely, Director of Kent County Housing and Community Development, by calling (616) 632-7404.

Persons with disabilities needing a reasonable accommodation to effectively participate in this public comment period should contact Linda S. Likely, Director, Kent County Housing and Community Development, 82 Ionia, Ave, NW, Suite 390, Grand Rapids, Michigan 49503 - (616) 632-7404 or e-mail linda.likely@kentcountymi.gov at least seven (7) days prior to the end of the public comment period.

This notice is officially dated November 21, 2015

Dan Koorndyk, Chair
Kent County Board of Commissioners

Results of Public Hearing: Housing, Community Development and HOME Needs

Kent County Community Development published a notice on Kent County's website at <http://www.accesskent.com/Departments/CommunityDevelopment> inviting the public to comment on the Housing, Community Development & HOME Needs of Kent County, Michigan.

Kent County Community Development held a public meeting on December 28, 2015 to discuss the Housing, Community Development & HOME Needs of Kent County, Michigan. The meeting opened at 4:00 PM at Kent County Community Development Department, 82 Ionia NW Suite 390, Grand Rapids, MI 49503. There being no public present the meeting closed at 5:00 PM. There were no written comments received regarding this publication.



First Program Year
Action Plan

Executive Summary

The County of Kent's (herein referred to as Kent County, the County, or the Consortium) FY 2016-2017 One-Year Action Plan covers the time period from July 1, 2016 through June 30, 2017. The Annual Action Plan describes the County's activities under the Urban County Consortium and planned initiatives to meet the National Objective of benefitting low- and moderate-income persons in Kent County.

The goals of the Consortium include the following:

- Create Suitable Living Environments,
- Develop Quality Affordable Housing Opportunities, and
- Stabilize Communities through Partnerships and Target Development

These initiatives will be administered by the Kent County Community Development Department (KCCD) through contracts with non-profit service agencies and development partners. All activities will be carried out as prescribed by the U.S. Department of Housing and Urban Development (HUD) in accordance with the federal regulations. The services and development projects in the upcoming fiscal year are determined by the citizens of the 32 local units of government that make up the Kent County Consortium. All cities, townships, and villages in Kent County are currently participating with the exception of the City of Rockford and the City of Lowell. The County's CDBG program also includes the western half of the Village of Casnovia, which is located in Muskegon County. The cities of Grand Rapids and Wyoming are Participating Jurisdictions and therefore excluded from the County Consortium.

The County of Kent has been notified by the U.S. Department of Housing and Urban Development (HUD) that its 2016-2017 annual entitlement grants are as follows:

A. Community Development Block Grant (CDBG) - \$1,400,992 and

B. Home Investment Partnership (HOME) - \$619,017

Entitlement funding will be supplemented with an estimated \$45,000 in Program Income from the Homeowner Rehabilitation program.

Additional Sources of Federal Funding Include:

Supportive Housing Program – Continuum of Care (CoC)	\$ 1,328,995
Emergency Solutions Grant (ESG)	\$ 119,521
Public and Indian Housing (PIH) - Housing Choice Voucher Program	\$ 3,598,256
Family Self-Sufficiency Program	\$ 117,082
Federal Total:	\$ 5,163,854

Non-federal Resources Include:

Home Investment Partnership (HOME) – Match (@ 25%)	\$ 154,754
Kent County Funds Leveraged through CDBG Program	\$ 200,000
Locally Leveraged Funds through CDBG Program	\$ 140,000
Supportive Housing Program – Continuum of Care Match (@25%)	\$ 332,249
Emergency Solutions Grant (ESG) Match (@100%)	\$ 119,521
Non-Federal Total:	\$ 946,524

The total for all sources of federal and non-federal funds including CDBG, HOME and ESG projected program income is eight million one hundred thirty thousand, three hundred eighty seven dollars (\$8,130,387).

The priorities and specific annual objectives addressed during the 2016-2017 program year are consistent with those identified in the First Year Consolidated Plan which include:

1. To eliminate conditions that are detrimental to health safety and public welfare through housing rehabilitation and assistance;

2. To expand and improve the quantity and quality of public and community facilities and improvements;
3. To eliminate conditions detrimental to health, safety and public welfare through public services that benefit low and moderate income persons; and
4. To remove slums and blight on a spot basis by clearance or preservation of properties with historical or architectural significance.

In carrying out these priorities, for 2016-2017, CDBG and HOME funds are budgeted for both services and development projects. CDBG will fund a number of construction projects including public facilities and improvements, neighborhood facilities, parks and recreational facilities, street improvements, sidewalks and non-motorized trails. Services funding will be provided for programs that serve presumed low and moderate income clientele such as senior citizens, disabled persons, and teens in the categories of parenting, foreclosure prevention counseling, and transportation services. Our rehabilitation programs will include homeowner occupied housing rehab loans, minor home repairs, and accessibility modifications. KCCD administrative costs are solely provided through the grant programs. This KCCD receives no County of Kent general funds.

CDBG programs are required to meet a national objective as defined by HUD. The projects presented in this plan meet the national objective of directly benefiting low and moderate income homeowners and residents, including seniors and the disabled. Seniors and disabled are considered members of the presumed benefit clientele, and therefore automatically considered low income. All construction projects and activities meet the national objective by taking place in low/mod target areas or because participant households are income qualified. CDBG Target Areas are based on U.S. Census data and cross referenced by HUD income standards, and have a ratio of low/mod income residents of 39.06 to every 100 residents (39.06%).

B. HUD HOME Investment Partnerships Program (HOME)

HOME-funded projects will be located within the 33 Participating Communities in the Kent County Consortium with the addition of the City of Wyoming under the umbrella of the Kent County HOME Consortium.

For 2016-2017, HOME funds are budgeted for the development of affordable housing for low-moderate-income households. KCCD will contract with qualified developers to conduct the acquisition and rehabilitation of rental and for sale units.

The HOME and ESG program requires each participating jurisdiction to contribute non-federal cash or in-kind matching funds to aid in the development of affordable housing. Because Kent County does not contribute to the Community Development Department financially, we meet our match obligation through direct contributions of in-kind, cash and voluntary support given to each specific development project. Each development partner documents match as it relates to each individual address for at least 25% of the development funds expended. One hundred percent of ESG funds are matched by our non-profit partner(s). We are not required to match amounts expended for General Program Administration and Community Housing Development Organization (CHDO) technical support.

The following is a list of planned activities utilizing the \$2,184,530 of CDBG, ESG, and HOME funds expected to be available July 1, 2016 through June 30, 2017.

2016-2017 CDBG, ESG and HOME Projects Summary

CDBG – PUBLIC FACILITIES AND IMPROVEMENTS	\$546,130
CDBG – PUBLIC SERVICES	\$202,592
CDBG – HOUSING REHABILITATION	\$363,521
CDBG – GENERAL PROGRAM ADMINISTRATION	\$288,749
CDBG – PROGRAM INCOME	\$ 45,000
HOME – HOUSING PROGRAMS	\$550,238
HOME – GENERAL PROGRAM ADMINISTRATION	\$ 68,779
ESG – PREVENTION RAPID REHOUSING	<u>\$119,521</u>
	<u>\$2,184,530</u>

General Questions Response:

Geographic Area

The County of Kent's (herein referred to as Kent County of the Consortium) FY 2016-2017 One-Year Action Plan covers 32 cities, townships, and villages in Kent County except for the City of Rockford and the City of Lowell both of which have opted out for this funding round and the cities of Grand Rapids and Wyoming, which operate their own entitlement CDBG programs. (The western half of the Village of Casnovia, which is located in Muskegon County, is also part of the County of Kent CDBG Program's jurisdiction.)

Basis for Allocating Investment

CDBG-funded service programs will directly benefit only low- and moderate-income homeowners and residents, including seniors and the disabled. The remaining projects are geographically targeted to primarily residential areas that have a high concentration of low- and moderate-income residents. CDBG Target Areas are determined by HUD income standards, in census tracts that have 26.42% or more of their residents classified by HUD as low- or moderate-income persons.

Meeting Underserved Need

Meeting the needs of the underserved or less advantaged members of the Kent County communities is a pressing goal. Each year increasing numbers of families who have not required any form of outside assistance to maintain their housing, buy their food, make repairs on their homes, etc., are now in need of assistance. It is our endeavor to make sure they know where to gain access to services and to be aware of the opportunities to participate in the CDBG/HOME allocation processes. Over the past year we have worked with all of the small villages and townships to make them aware of our services. For example, through the Homeowner Repair Program, we have developed an information and online application page on accesskent.com as well as links to our information in the electronic newsletters, web pages and bulletins of the Local Units of Government. We will continue to attend meetings in the sub-rural communities in our jurisdiction and publicize our programs in the impacted communities. We believe this will help us meet the underserved need; reaching out-county low- moderate-income families and individuals.

Federal State and Local Resources

Federal Funds that are expected to be used in our communities identified in the plan are as follows:

▪ Supportive Housing Program – Continuum of Care (CoC)	\$ 1,328,995
▪ Emergency Solutions Grant (ESG)	\$ 119,521
▪ Public and Indian Housing (PIH) - Housing Choice Voucher Program	\$ 3,598,256
▪ Family Self-Sufficiency Program	\$ 117,082

Lead Agency

The Kent County Community Development Department is responsible for administering and managing housing and community development related grants as an integral part of Kent County's affordable and supportive housing strategy. Various County departments and agencies, in conjunction with federal, state, and local governmental and non-profit entities, as identified in the 2016 Consolidated Housing and Community Development Plan, implement strategies to resolve the lack of affordable housing and sustainable communities.

- Community Development Block Grant (CDBG)
- Kent County HOME Investment Partnerships (HOME)
- City of Wyoming HOME Investment Partnership (HOME)
- Continuum of Care (CoC)
- Neighborhood Stabilization Program (NSP)
- Emergency Solutions Grant (ESG)

The Kent County Housing Commission, which is jointly staffed and located with the Kent County Community Development Department, is responsible for managing and implementing the following housing programs and activities within Kent County:

- Housing Choice Vouchers (Section 8)
- Family Unification Program Vouchers (FUP)

County of Kent

- Veterans Affairs Supportive Housing Vouchers (VASH)
- Family Self-Sufficiency Program (FSS)
- Section 8 Homeownership Program (HCV)

The Rockford Housing Commission is responsible for the following programs within its jurisdiction:

- Capital Fund Program
- Housing Choice Vouchers (Section 8)

The remaining programs identified herein are managed either by the City of Grand Rapids, Detroit HUD Field Offices, the Michigan State Housing Development Authority (MSHDA), or the Grand Rapids office of the U.S. Department of Agriculture Rural Development.

▪ Rural Development Multi-Family Housing Rental Assistance	\$40,900,000
o Number of Guarantee Loans	303
▪ Rural Development Single Family Housing Direct Loans	\$1,300,000
o Number of Direct Loans	14

State of Michigan programs are administered in Kent County by Non-housing Community Development activities identified herein are managed and implemented by the Kent County Community Development Department.

Citizen Participation Response:

Kent County conducted a public hearing on December 30, 2015 to obtain opinions and recommendations on the housing, community development, and home needs of the entire area. Via a notice in The Grand Rapids Press, the general public, social service agencies, housing providers, and nonprofit organizations were invited to attend the hearing. Additionally, the notice was also posted on the County's web site.

The Housing and Community Development Director for Kent County opened the public hearing at 4:00 p.m. on December 30, 2015 in the offices of the Kent County Community Development Department at 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503. There being no persons present to provide input, the public hearing was closed at 5:00 p.m.

Kent County has historically allocated a majority (58%) of its non-housing Community Development Block Grant funds to the participating communities within the county. This allocation is based on the percentage of low- and moderate-income persons residing within these jurisdictions. The needs portion of the non-housing Community Development Block Grant activities is determined through the decision-making process at the local governmental level. Kent County firmly believes that local community needs can best be determined by local decision makers.

The allocation process utilized by the Kent County Community Development Department is extremely detailed and each jurisdiction is provided with a comprehensive set of instructions and guidelines.

Public hearings on the proposed use of CDBG funds were conducted in December of 2015 and in January and February of 2016, by the local Township Boards, City Councils and Village Councils of the CDBG Program Participating Communities.

In order to assist in the planning and data gathering effort, the Kent County Community Development Department maintains official or unofficial contact with the following organizations and agencies to assist in obtaining housing needs data, defining specific programs or funding sources, identifying emergency housing needs, identifying supportive housing services, and planning for meaningful long-term housing market impact.

Kent County Emergency Needs Task Force &
Emergency Shelter Assistance Subcommittee
Kent County Community Mental Health
Kent County Health Department
Fair Housing Center of West Michigan
Kent County Department of Health & Human Services
Home and Building Association of Greater Grand Rapids
Grand Rapids Housing Commission
Rockford Housing Commission
Wyoming Housing Commission
Michigan State Housing Development Authority (MSHDA)

County of Kent

U.S. Department of Agriculture, Rural Development (USDA-RD)

U.S. Department of Housing and Urban Development (HUD)

Various local financial institutions

Various emergency housing providers

Public Review Period

The public hearing draft of the 2016-2017 Annual Action Plan element of the 2016-2021 Consolidated Plan document was made available for the 30-day public comment period on February 12, 2016. The "Notice of Public Hearing and Notice of Public Availability" was published in The Grand Rapids Press on February 13, 2016. The public hearing draft 2016-2017 Annual Action Plan element of the 2016-2021 Consolidated Plan document was made available to the public at the Kent County Community Development Department, 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503, the Grand Rapids Public Library –Main Branch, Reference Desk 111 Library Street NE, Grand Rapids, MI 49503 and on www.accesskent.com.

A public hearing on the 2016-2017 Annual Action Plan element of the 2016-2021 Consolidated Plan document was held on March 30, 2016 at 4:00 p.m. in the offices of the Kent County Community Development Department at 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503. There being no persons present to provide input, the public hearing was closed at 5:00 p.m.

No written comments were received in response to the "Notice of Public Hearing and Notice of Public Availability" published in The Grand Rapids Press on February 13, 2016.

Citizen Participation Plan

In accordance with the regulations of the U.S. Department of Housing and Urban Development (HUD) pertaining to the Community Development Block Grant (CDBG), and HOME programs and the preparation of planning documents, funding applications (and amendments thereto) and performance reports related thereto, the following procedures for obtaining citizen participation shall be adhered to by the County of Kent.

Citizens living within the Kent County CDBG Program Participating Communities are encouraged to submit their views, opinions, and proposals regarding CDBG and HOME needs, proposed uses of funds, and performance either in writing or during the course of public meetings or public hearings held by participating local units of government or at public hearings held by the County of Kent. Low and moderate income persons, particularly those living in slum and blighted areas, or who are residents of public or assisted housing developments, or who are living in areas where CDBG and HOME funds are proposed to be used or who are residents of predominantly low and moderate income neighborhoods, are encouraged to communicate their views, opinions, and proposals.

The County of Kent will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to its CDBG and HOME planning and application documents (and any amendments thereto), along with all appropriate records (defined as those records not specified as being exempt from release under Michigan's Freedom of Information Act) pertaining to activities implemented by CDBG and HOME funding within the five-year period preceding the date of any such request for access to such records. Local and county officials will be made aware of the CDBG and HOME programs and will be available and accessible to answer questions concerning the CDBG and HOME, programs, particularly from low and moderate income persons.

Before each CDBG and HOME program year, the County of Kent shall notify all 33 of its Urban County CDBG Program Participating Communities of the annual CDBG Program's requirement to conduct a public hearing to afford interested residents and other parties opportunity to provide their views, opinions, and proposals.

These city/village/township public hearings shall be given reasonable local public notice, and shall be conducted prior to the programming of the Participating Community's allocated CDBG funds. All local decisions regarding the programming of allocated CDBG funds shall be officially adopted by the legislative body of the Participating Community, and documentation of such action shall be required in the form of meeting minutes and/or a resolution submitted to the Community Development Department.

During each CDBG and HOME program year, the County of Kent, through its Community Development Department, shall conduct three (3) public hearings to afford interested parties opportunity to provide their views, opinions, and proposals.

County of Kent

One of these public hearings shall focus on providing an opportunity for interested parties to provide their views and opinions on housing and community development needs, and this public hearing shall be held before the annual planning and/or application document is prepared and made available for public comment. Notice of this public hearing shall be published in The Grand Rapids Press at least fourteen (14) days prior to public hearing and posted on the County of Kent County web site.

In addition, written notification shall be mailed to public agencies and other interested parties that have either participated in previous public hearings or expressed an interest in being advised of the public hearing date. Such written notification shall be mailed to the Hispanic Center of Western Michigan, various minority-based community groups, Disability Advocates of Kent County, and to senior/community centers located in the Participating Communities of the Urban County CDBG Program. The County of Kent reserves the right to conduct this public hearing on a joint basis with other local CDBG and HOME entitlement grantees, for the purpose of obtaining a county-wide expression of housing and community development needs.

The second of the three (3) annual public hearings shall focus on providing a reasonable opportunity for citizens, public agencies and other interested parties to examine and submit comments pertaining to the proposed planning document and funding application. This public hearing shall be held only after a summary of the proposed planning document and funding application, along with a notice of the date, time and location of the public hearing, is published in The Grand Rapids Press. This notice shall be published at least thirty (30) days prior to the public hearing date. Copies of the proposed planning document and funding application shall be available for public inspection and review during the thirty (30) day period prior to the public hearing. A summary of the views and comments received during the review period and at the public hearing, and a summary of any views and comments not accepted and the reasons therefore, shall be prepared by the County of Kent and attached to the final planning document and funding application submitted to HUD.

The third of the three (3) annual public hearings shall focus on providing a reasonable opportunity for citizens, public agencies and other interested parties to review and comment upon CDBG and HOME program performance. Notice of this public hearing, including notice of the availability of the proposed performance report and the date, time and location of this public hearing shall be published in The Grand Rapids Press and posted on the County of Kent web site.

This notice shall be published at least fifteen (15) days prior to the public hearing date. Copies of the proposed performance report shall be available for public inspection and review during the fifteen (15) day period prior to the public hearing. A summary of the views and comments received during the review period and at the public hearing shall be prepared by the County of Kent and attached to the final performance report submitted to HUD.

In addition to the above three (3) public hearings, the County of Kent will hold a public hearing prior to the submission of any substantial amendments to its HUD-approved planning document/funding application. The requirements for any such public hearing shall parallel the requirements specified above for the second of the three (3) annual public hearings, as set forth above. A substantial amendment to a HUD-approved planning document/funding application is required when an activity is proposed to be undertaken during the course of a program year and that activity is not included in the HUD-approved planning document/funding application AND the cost of that proposed new activity exceeds ten percent (10%) of the annual CDBG or HOME entitlement grant for the subject program year.

All public hearings shall be held at locations convenient to potential and actual CDBG and HOME program beneficiaries, in buildings and rooms accessible to persons with disabilities. Consistent with county policy and practice, all public hearings shall be held on a weekday afternoon. Provisions of Michigan's Open Meetings Act shall apply. In the event a proposed project or activity will apparently impact a significant number of non-English speaking persons, bi-lingual opportunities will be provided at the public hearings through the use of local resource persons. Decision-making may be delayed when a significant portion of the public hearing participants do not speak English.

Technical assistance will be provided to groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance under any program included in the planning document/funding application.

Complaints received from citizens related to the planning document/funding application, amendments thereto, performance reports, and CDBG and HOME funded program activities will be addressed in a timely manner. In the case of written complaints, the County of Kent will provide a written response within fifteen (15) working days, where practicable.

County of Kent

It is the intent of this Citizen Participation Plan to encourage citizens, public agencies and other interested parties to become better informed of and to participate in the process of planning and implementing activities funded by Federal agencies that impact their homes, neighborhoods and communities. Views, comments, opinions and complaints are to be welcomed as forms of improved communication. It must be clear, however, that the County of Kent, by contractual obligation, cannot allow citizen participation activities to restrict its responsibility or authority for the development and execution of its Federally-assisted programs.

All phases of the process will be conducted by the Kent County Community Development Department in an open manner. Citizens are encouraged to participate at all levels and will be given access to program information during each phase of the programs as outlined herein.

Technical Assistance

The staff of the County of Kent Community Development Department shall provide technical assistance to individual citizens and citizen groups, with particular attention to those groups representative of persons of low or moderate income, as may be required to adequately provide for citizen participation in the planning, implementation and assessment of CDBG and HOME programs.

Such technical assistance is intended to further meaningful citizen participation in the community development decision making process. Technical assistance will also be utilized to foster public understanding of CDBG and HOME program requirements.

Technical assistance will be provided on request and may include, but not necessarily be limited to: interpretation of the CDBG and HOME programs and its rules, regulations, procedures and other requirements; providing information and/or materials concerning the programs; and, assisting low and moderate income citizen, and low/mod income communities develop statements of views, identify their needs, and to develop activities and proposals for projects which when implemented, will advance the resolution of those needs. Technical assistance may be obtained by contacting the Community Development Department at 616-632-7400.

Any citizen, public agency or other interested party that desires further information on this Citizen Participation Plan, or who wishes to express a view, comment, opinion or complaint on a Federally-assisted activity under a planning document, funding application or agreement or grant agreement subject to this Citizen Participation Plan, is invited to contact Matthew VanZetten, Interim Director of Housing and Community Development for the County of Kent, at 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503, (616) 632-7404.

Institutional Structure Response

The Grand Rapids metropolitan area fortunately continues to have a highly committed non-profit community devoted to the housing and social service needs of low income persons and families. The private sector has also proven to be quite responsive to the housing and social needs of the area's residents, particularly the churches, local foundations, and professional associations. The greatest response from these groups has been in the area of homelessness. While most groups work primarily in the city of Grand Rapids, several have focused on out-county housing issues and concerns. The homeless advocacy groups serve residents throughout Kent County.

Kent County will continue to work to improve the institutional structure during the 2016-2017 program year in a number of important areas, including internal capacity building in the area of HOME Program administration, outreach to CHDOs, certification of CHDOs for Kent County HOME Program participation and utilization of the Kent County Land Bank as appropriate.

Action Plan Monitoring Response

In order to monitor housing and community development projects and ensure compliance with program requirements, each subrecipient and developer contract establishes the parameters and timelines expected in the CDBG and HOME program. Developers have a clear timeline for submission of invoices and delivery of housing units. Local Units of Government and nonprofits have clearly delineated expectations and are required to enter into contracts for specific projects with timelines for completion. Most contracts have a one year timeframe or less and include language relative to the debarred list and conflict of interest.

Kent County has established a monitoring system for its Community Development Block Grant and HOME programs, which it uses to monitor all subrecipients of CDBG and HOME assistance provided throughout Kent County.

County of Kent

Subrecipients of CDBG funding are required to submit regular reports on both financial and program activities status. The Community Development Manager maintains communication with subrecipients on a regular basis to facilitate project timeliness. Additionally, an annual on-site monitoring of the subrecipient's program is conducted. Finally, Kent County requires an independent (CPA) financial audit of any agency under contract.

When housing rehabilitation is involved, the following standards are applied:

1. Housing Inspection Manual (24 CFR 882.109), for Housing Quality Standards or for local building code, whichever is higher.
2. Lead-Based Paint Hazard Elimination (24 CFR Part 35).

In addition, the following additional standards are utilized:

1. CABO Model Energy Code (1994); or
2. Michigan Energy Code
3. Housing Regulations for Kent County

In addition to these general monitoring guidelines, any other items that are deemed necessary for proper monitoring of subrecipients are utilized on an as-needed basis.

As the lead agency in the HOME program, Kent County Community Development Department assumes lead responsibility for ensuring compliance of all HOME program activities. To that end, the following are monitoring activities and responsibilities of the Community Development Department as the lead agency.

For any HOME activity, compliance review can occur at up to four stages in the process:

1. At time of project selection and approval: The applicable subrecipient/subgrantee is responsible for assembling all required information and submitting it to the Community Development Department, subsequent to commitment of funds;
2. During implementation, construction and disbursement: In addition to routine Kent County HOME program monitoring of HOME-funded projects, the applicable subrecipient/subgrantee is responsible for monitoring implementation of the project, including construction monitoring, and for certifying and documenting compliance;
3. Upon project completion: Recapture of HOME funds under the Kent County HOME Program guidelines may be required (refer to the HOME Program narrative section in the Kent County Annual Action Plan); and
4. If rental units are assisted, ongoing compliance monitoring will occur annually in compliance with the requirements at 24 CFR 92.252 and 92.504(d) for on-site inspections.

All HOME compliance issues will be reviewed at one or more of these stages.

The Community Development Department monitors its own performance in meeting goals and objectives set forth in the Consolidated Plan through the annual audit process.

Lead-based Paint Response

Number of Housing Units with Lead-Based Paint Hazards

Each year the American Communities Survey conducts a national survey conducted which helps HUD established estimates for the percentage of houses containing lead-based paint, based on the year of construction. Utilizing these percentages from the 2010 ACS, we estimate that 127,021 out of the 227,177 occupied houses in Kent County, excluding Grand Rapids and Wyoming were built before 1978. This means 55% of the occupied housing units are a potential risk for lead-based paint hazards.

Understanding the Problem

On May 16, 2014 the US Center for Disease Control and Prevention lowered the level of concern for childhood lead poisoning. This change, according to the Healthy Homes Coalition of West Michigan, will mean a greater focus of action on those children with the highest blood lead levels. Respectively, in 2011 Kent County had 68 children birth through age five identified as having elevated blood lead levels above 10.0 ug/dL, and 727 children had lead levels above 5.0ug/dL.

Addressing the Need

In order to address the most common sources of childhood exposure to lead which are deteriorated lead-based paint and lead-contaminated dust and soil, Kent County will continue to partner with the "Get the Lead Out!" Home Repair program offered through the City of Grand Rapids in partnership with the Kent County Health Department. In addition, Kent County adheres to the environmental review policies established under NEPA on all development projects, including Homeowner Rehabilitation, Minor Home Repair, HOME Investment Partnerships, etc. Properties rehabilitated with CDBG/HOME funds are required to undergo lead testing and abatement when rehabilitation thresholds are met or lead testing indicates contamination. We will continue to require environmental reviews of our projects, with particular concern towards units constructed before 1978.

It should also be noted that both national studies and local experience has shown that rental units have a higher prevalence of lead-based paint hazards when compared to owner-occupied units (30% and 23%, respectively). Our HOME Investment Partnership will address this by rehabilitating older properties and creating affordable rental and for-sale units that are safe for occupancy and free of lead paint hazards for low- moderate-income households. We plan to rehabilitate at least 10 units of affordable housing that will address help reduce the lead-based paint hazards. The Kent County Housing Commission will also work to eliminate the lead-based paint hazard through adherence to the Housing Quality Standards inspections of all of the Section 8 HCV program properties. Two staff members have been certified as visual lead assessors. They perform HQS inspections of 100% of the HCV units thereby eliminating the lead-paint hazard among our low and very low-income clients.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

(Definitions: "**Large Related:** A household of 5 or more persons, which includes at least one person, related to the householder by blood, marriage or adoption. **Small Related:** A household of 2 to 4 persons, which includes at least one person, related to the householder by birth, marriage, or adoption.")

Priority 1: Very Low-Income Elderly, Small Related, Large Related, and All Other Renter Households (0-30% Median Family Income).

Analysis: As described in the section on Housing Needs, there is a strong need for assistance within the Extremely Low-Income Renter population. That need stems from a 87.5% incidence rate of housing problems within this income category, of which nearly half are renters.

Strategy Development Activities: In order to alleviate this need, Kent County will continue its Section 8 rental voucher program including applying for additional vouchers that may become available in Kent County and its Continuum of Care program, both of which are aimed at this extremely-low income renter population.

Programs: Kent County operates three programs aimed at this priority need group. The first is the Section 8 Housing Choice Voucher program. This program has a goal of addressing the housing needs of 35 Elderly households, 179 Small Related households, 67 Large Related households, and 37 All Other households. The second program is the Continuum of Care program. The goal of this program is to address the needs of 57 Small Related households, 5 Large Related households, and 110 All Other households.

Priority 2: Very Low-Income Small Related and Large Related Owner Households (0-30% Median Family Income).

Analysis: As can be seen from the Housing Needs Table, there is a very high rate of severe cost burden among this population group, with Small Related owners showing a rate of 64.4% and Large Related Owners showing a rate of 76.8%. This displays an acute need for assistance which Kent County recognizes.

Strategy Development Activities: In order to alleviate this need, Kent County will be supporting several programs. Kent County will continue its CDBG Rehabilitation Loan and Home Repair Services programs. Additionally, HOME programs will be initiated during the first year of the plan in order to more fully meet the needs of this population group.

Programs: Kent County operates several existing programs and is undertaking new program areas to serve this priority need group. The Kent County CDBG Rehabilitation Loan program serves the needs of 2 Small Related and 2 Large Related households in this priority need group. Additionally, the Home Repair Services program reaches 41 Small Related and 16 Large Related households. Several new programs will be increasing the assistance to this population. First is the HOME Infill and rental rehab Program which will reach 2 Small Related and 2 Large Related households.

Priority 3: Extremely Low-Income Elderly and All Other Owner Households (0-30% Median Family Income).

Analysis: Once again, it can be seen from the Housing Needs Table that this population group suffers from acute housing cost burden. Rates of severe cost burden are 40.8% and 71.9% for Elderly and All Other owner households, respectively, in this income group.

Strategy Development Activities: In order to meet the needs of this priority group, Kent County will be supporting several programs. Kent County will continue its CDBG Rehabilitation Loan and Home Repair Services programs.

Programs: Kent County operates several existing programs areas to serve this priority need group. The Kent County CDBG Rehabilitation Loan program serves the needs of 2 Elderly households in this priority need group. Additionally, the Home Repair Services program reaches 42 Elderly and 17 All Other households.

Priority 4: Low-Income Elderly, Small Related, and Large Related Owner Households (30-50% Median Family Income).

Analysis: These households are not in as desperate of circumstances as the very low-income group, but their needs are still great. There are 2,216 households within this priority need group who struggle with a housing cost burden. Thus Kent County has undertaken several programs to assist this group.

Strategy Development Activities: In order to alleviate this need, Kent County will be supporting several programs. Kent County will continue its CDBG Rehabilitation Loan and Home Repair Services programs.

Programs: Kent County operates several existing program areas to serve this priority need group. The Kent County CDBG Rehabilitation Loan program serves the needs of 2 Elderly, 2 Small Related, and 1 Large Related households in this priority need group. Additionally, the Home Repair Services program reaches 46 Elderly, 42 Small Related, and 16 Large Related households.

Priority 5: Low-Income All Other Owner Households (30-50% Median Family Income).

Analysis: Within this category, as can be seen from the Housing Needs Table, we find that nearly 73.7% of the All Other Households in the Kent County CDBG Program Participating Communities suffers from a housing cost burden of some kind. This has led the county to undertake programs of assistance for this group.

Strategy Development Activities: Kent County will continue to fund its Home Repair Services program, which seeks to meet the needs of this priority group.

Programs: Kent County funds the Home Repair Services program which will provide services to 18 All Other households.

Priority 6: Moderate-Income Large Related Owner Households (50-80% MFI).

Analysis: There are still needs to be addressed by households who are at the moderate income level. Among large related households there is still a greater than 65% rate of housing cost burden, which Kent County attempts to alleviate through its programs.

Strategy Development Activities: Kent County will continue to fund its CDBG Rehabilitation Loan program. Additionally, a new HOME program will be initiated to help meet the needs of this priority group.

Programs: The Kent County CDBG Rehabilitation Loan program will serve the needs of 2 Large Related households.

Priority 7: Homeless (The Kent County housing priority for the homeless will be discussed in a later section of this report dedicated to the subject.)

Priority 8: Non-Homeless Special Needs

Strategy Development Activities: Kent County will continue to fund its Section 8 and Continuum of Care programs to meet the needs of the members of the community with disabilities. Additionally, the Kent County Community Development Department funding will be continued through other non profit agencies that provide information and services for the disabled community, including accessibility modifications on homes.

County of Kent

Programs: The Section 8 Housing Choice Voucher program assists 218 households with disabled members who are in the very low income category every year. Additionally, the Continuum of Care program provides services for 112 persons with serious mental illness, 8 persons with chronic substance abuse problems, 11 persons with both serious mental illness and chronic substance abuse problems, and 20 persons with HIV/AIDS (these numbers are included with the Continuum of Care numbers for the specific household type and income level above).

Disability Advocates of Kent County (DAKC) provides several services for the members of the community with disabilities. The DAKC provides at least 2 community outreach programs. Additional services include assisting persons with disabilities with finding appropriate housing and providing assistance, referral services, and information to individuals and groups. Home Repair Services provides access modifications in at least 8 households.

Needs of Public Housing Strategy Response

The only public housing in Kent County outside the cities of Grand Rapids and Wyoming is Rogue Valley Towers, operated by the Rockford Housing Commission. This 52-unit senior/disabled mid-rise tower has been well-maintained, but routine renovations are needed and planned through the HUD Capital Fund Program (CFP). No management changes are anticipated to occur during the 2016-2017 program year.

The 52-unit Rogue Valley Towers operated by the Rockford Housing Commission and occupied by senior/disabled residents, has a Resident Council that reviews all management operations and proposals. It has not been a goal of the Rockford Housing Commission to promote resident participation in homeownership programs.

Barriers to Affordable Housing Response

In order to combat the barriers families and individuals face when seeking access to affordable housing, Kent County will continue to fund the Fair Housing Center. The Fair Housing Center will conduct testing for discrimination in housing practices and assist in training community members in Fair Housing Practices and their rights.

In addition, utilizing our HOME Investment partnership program funds, we will work with our non-profit development partners to acquire and rehabilitate foreclosed housing for rental or re-sale. By providing development subsidies in more of the communities outside of the traditional hyper-segregated urban core, and inner rings of the suburban sprawl, we will be able to promote the decentralization of poverty, and create more economically integrated communities. Affordable housing will then be available to residents in place, in the entirety of Kent County.

In 2011, the County of Kent published an Analysis of Impediments (AI). Through the Consulting Firm of McKenna Associates, Inc., The County of Kent Department of Housing and Community Development conducted extensive research in preparation for the A.I. The compilation and analysis of the results of this research were the foundation for the A.I. document.

Additionally, the Five-Year Consolidated Strategy and Plan identified a number of general areas of activities wherein Kent County could assess the negative effects of public policies, rules, and regulations on the availability of affordable housing.

Analysis of Impediments to Fair Housing in Kent County: This report identified impediments to fair housing within Kent County. Kent County will continue to review the information and initiate actions recommended as being necessary to remove fair housing barriers.

Kent County will also continue to support fair housing efforts, particularly through its relationship with The Fair Housing Center of West Michigan (FHCWM). Kent County will continue to contract with the FHCWM to perform educational and testing programs throughout the Kent County CDBG Program Participating Communities.

Kent County also participates in the Affordable Housing Committee of the Home and Building Association of Greater Grand Rapids. This committee meets quarterly, and is interested in addressing regulatory policies that pose barriers to affordable housing. During the 2016-2017 program year, Kent County will continue to participate as a member of this committee, with a view toward providing a communications channel to be used to suggest the implementation of recommendations made by this committee, where appropriate.

County of Kent

Citizens League of Greater Grand Rapids Affordable Housing Task Force - "A Dream Deferred" (February, 1992): The Citizens League report identified a number of recommended actions for local governments. The only recommendation addressed directly toward Kent County was to create and establish a Kent County Housing Commission. As previously indicated herein, the Kent County Board of Commissioners has created the Kent County Housing Commission, pursuant to Act 18 of the Michigan Public Acts of 1933, as amended. To date the Kent County Housing Commission has been awarded 508 Housing Choice (Section 8) Vouchers which include Family Unification Vouchers, VASH Vouchers (Veteran) and also has been awarded HUD Family Self-sufficiency Program grants for several years and in 2006 was granted the designation of Homeownership Program. These coordinated programs are focused on removing barriers to affordable housing.

HOME Action Plan Response

The HOME Investment Partnerships Program or HOME Program was created by the National Affordable Housing Act of 1990. The purpose of the HOME Program is to increase the supply of affordable housing for low and very-low-income households. The program was designed to reinforce several important values and principles of community development:

- Provide decent, quality, affordable housing to lower-income households,
- Expand the capacity of nonprofit housing providers,
- Strengthen the ability of state and local governments to provide housing, and
- Leverage private-sector participation.

As a Participating Jurisdiction, Kent County is the recipient of development formula grant programs administered by the U.S. Department of Housing and Urban Development (HUD). Kent County is the lead partner in the Kent County HOME Consortium which included the City of Wyoming. The Consortium will accept its HUD HOME Investment Partnerships (HOME) Program 2016-2017 entitlement funds in the amount of \$619,017. The grant funds are allocated based on the following formula provided by HUD.

▪ Kent County (@73.04%)	\$406,917.02
▪ City of Wyoming (@26.96%)	\$150,198.28
▪ Administration (@10%)	\$ 61,901.70

Toward this end, the County of Kent has budgeted HOME funds for various affordable housing projects; and, has identified sources of HOME project matching contributions (cash and non-cash).

Proposed Uses

The Consortium's HOME funds will be allocated to develop affordable rental and for-sale housing units in the amount of \$557,115.30. Kent County has renewed the certification of two developers and granted two additional CHDO Certifications to experienced organizations who demonstrated the requirements. Two certified CHDO developers will substantially rehabilitate units for sale or rent to low-income households. Energy efficiency will be emphasized, and construction and/or rehab of these projects will meet the 15% CHDO set aside requirement.

Program Match

The HOME program requires a 25% non-federal cash or non-cash match(in-kind) contribution by the Participating Jurisdiction. Because Kent County Community Development Department does not receive any non-federal funds for the operation of its programs match is contributed directly to the individual units of housing as they are developed. Developers attribute in-kind contributions, PILOT, FHLB Loans, volunteer labor and donated funds, goods and/or services for HOME eligible projects located in our service area to Kent County to use to meet the match obligation.

Program Administration

The HOME program will be administered by the Community Development Department. All non-profit organizations participating in the HOME program will be contracted with as developers. The Community Development Department works closely with the Fiscal Services Department to assist with the financial management of the program with responsibilities for processing invoices and payments, entering draws in IDIS and applying reimbursements to the County accounts. In addition, the County Legal Department assists with the preparation, processing and approval of developer contracts. They work to gain the approval of the commission and review documents for consistency with HUD regulations. Overall, the administration of Community Development is a shared responsibility with assistance throughout the County structure.

General Requirements

The HOME Investment Partnerships Program (HOME) permits the use of funds to assist Kent County and housing developers to acquire property and rehabilitate/build homes for rental or sale to income-eligible households at or below 80% ami. Funds may also be used to assist homebuyers by reducing the sales price below the appraised value and/or by providing downpayment and closing cost assistance. A homebuyer project may include both a development subsidy and homebuyer assistance, or homebuyer assistance only.

Principal Residence/Period of Affordability

The HOME program requires that a property assisted under a homeownership program be used as the owner's principal residence for a designated time period known as the period of affordability. For rental units assisted with HOME funds, the program requires the assisted property to remain affordable for future tenants for a designated period of time.

The period of affordability is based on the amount of HOME assistance that enabled the homebuyer to purchase the house, regardless of source (i.e. Kent County, MSHDA) or for the amount of the development subsidy in the case of rental units. The applicable periods of affordability are as follows:

Amount of HOME Assistance	Minimum Period of Affordability
<\$15,000	5 Years
\$15,000 - \$40,000	10 Years
>\$40,000	15 Years

Recapture Provisions

The HOME program requires that the assisted property be subject to resale restrictions or recapture provisions, as cited in 92.254(a)(5), for the period of affordability. Kent County will use the recapture option which would secure the amount of HOME funds that remain in the project (i.e. homebuyer assistance) by a silent second mortgage and promissory note. The amount of recapture is forgiven on a monthly pro-rated basis over the length of the affordability period.

If the ownership of the housing is conveyed pursuant to a foreclosure sale as provided in Section 92.254(a)(5)(i)(A) of the HOME Rule, the owner shall have a recapture obligation, in accordance with §92.254(a)(5)(ii)(A), based upon the amount of net proceeds (if any) from the foreclosure sale. The amount of the repayment obligation, as provided in the recapture agreement, shall be prorated based upon the time the homebuyer has owned and occupied the housing measured against the affordability period. If there are no net proceeds from the foreclosure, repayment is not required, and HOME requirements are considered to be satisfied.

For rental housing, the affordability period is secured by a Retention Agreement for Restriction of Use and Occupancy that is recorded as a restrictive covenant on the property. The Retention Agreement specifies that the owner of the rental property must follow the HOME affordability guidelines for the designated period of time and specifies the reporting requirements required by the HOME program.

Development and Homebuyer Subsidies

Housing developers who are undertaking acquisition and/or rehabilitation/construction activities under a homeownership program may be assisted with HOME funds for a development subsidy and for homebuyer assistance. For units developed for rental, the County and the Developer will enter into a contract delineating the terms of development with total funds utilized secured by a promissory note for the period of affordability. For units developed for-sale, once the homebuyer closes on the property, the second mortgage and promissory note will be recorded thereby protecting the HOME development and homebuyer subsidies:

- 1) development subsidy (forgiven by Kent County)
- 2) homebuyer assistance (covered under a new silent second mortgage and promissory note from the homebuyer to Kent County), and
- 3) repayment to Kent County's HOME Program.

County of Kent

Homebuyer assistance may be in the form of a reduced sale price, down-payment/closing cost assistance, or other eligible forms of assistance, however it must exceed \$1,000.00. The homebuyer assistance would be secured by a silent second mortgage and promissory note from the homebuyer to Kent County for the applicable period of affordability. The recapture provisions will apply if the assisted homebuyer sells the home or otherwise does not continue to occupy the home as their principal place of residence during the applicable period of affordability.

Kent County Programs

Kent County may use HOME funds for the acquisition and/or rehabilitation/construction of properties for resale to homebuyers and for acquisition and rehabilitation of property for creation of affordable rental units. The provisions for the affordability period and recapture will apply to the Kent County HOME projects.

Accordingly, if the assisted homebuyer sells the home during the applicable period of affordability, Kent County shall recover the HOME homebuyer assistance from the net proceeds of sale, as specified in 92.254(a)(5)(ii). The amount of funds to be recaptured is based on the following: First, the HOME amount covered under the mortgage and promissory note will be reduced pro-rata based on each complete month the homebuyer has owned and occupied the house, based on the following schedule:

Affordability Period	Pro-Rated Amount
5 Years	1/60 per month
10 Years	1/120 per month
15 Years	1/180 per month

Secondly, the downpayment, principal payments, and cost of capital improvements made by the homebuyer since purchase would be calculated. If the sum of these investments, plus the prorated amount due Kent County, exceeds the net proceeds of sale, the homebuyer would be allowed to recover his or her investment in the property first, with the remainder being paid back to Kent County. Such an amount would be considered payment in full. The homebuyer would be allowed to keep any net proceeds left after recovery of their investment and repayment of HOME assistance to Kent County.

In those cases where a homebuyer violates the terms and conditions of the second mortgage and/or promissory note, (e.g., sells the property on a Land Contract without the approval of Kent County or uses the property for rental purposes), Kent County reserves the right to require the full repayment of the pro-rated amount of HOME assistance. As specified above, all rental units funded with HOME funds through Kent County have their affordability retained through the use of a recorded Use and Occupancy Restriction specific to the rental unit property.

The Community Development Department conducts outreach on an annual basis to minority- and women-owned businesses to advertise contracting opportunities created by the HOME and CDBG program activities in professional and construction-related trades. The outreach is conducted in publications whose target audience includes Hispanic and minority households in order to reach a broad demographic.

In addition, documents are translated or translators provided when communication is a barrier for program participants or individuals seeking services.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

Action Plan Special Needs Response:

The Kent County Community Development Department participates in the community coordination to ensure all resident's basic needs are met through the Essential Needs Task Force (ENTF). Via the ENTf oversight body and the Community Development Department, the County works with the Continuum of Care as they endeavor to end homelessness in Kent County. The CoC coordinates the submission of all applications to MSHDA and HUD for MSHDA Emergency Solutions Grants (ESG), and Continuum of Care (CoC) Program funding for Kent County. In addition the CoC determines unmet needs, develops strategies, and recommends goals and activities for the coming year while providing guidance on funding priorities for federal, state, and city homelessness resources. Kent County is unable to provide funding of \$8,00.00 in administrative funding as has been past practice to support the position of the Continuum of Care Coordinator due to the conflict of interest provision. This position coordinates the CoC's submissions and Annual Reports, data sharing through HMIS, oversees outreach and implementation of strategic planning activities.

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The Annual Action Plan covers the activities supported by the Emergency Solutions Grants (ESG) Program, a federal entitlement program directed to cities and states. For FY 2016-2017, the City of Grand Rapids was allocated a Federal Emergency Solutions Grant in the amount of \$319,602. MSHDA designated \$195,075 of its total FY 2016-2017 allocation for Kent County. Distribution of these funds is handled through the CoC application and decision making process.

Ending Homelessness

The Housing Continuum of Care has identified high-priority sub populations such as Veterans, chronically homeless individuals, families and youth of focus concentrated efforts at reducing the amount of homelessness in those categories to zero. Kent County will support those efforts through applications from homeless service and housing providers for state and federal funds, as consistent with the CoC's strategic plan.

In addition we will continue to work as partners on the ENTF, and participate in the Strategic Planning Body of the CoC to further advance the efficient application, distribution and implementation of resources allocated to service providers throughout the County. The Continuum of Care will receive FY 2016-2017 Emergency Solutions Grant (ESG), Supportive Housing Program (SHP), and CDBG funding from both Kent County and the City of Grand Rapids.

Although the emergency shelter programs are centered in the City of Grand Rapids, they serve families and individuals throughout Kent County. Families in transition or experiencing homelessness may seek assistance funded by MSHDA and HUD through the City of Grand Rapids and MSHDA. Kent County supports the Housing Assistance Program and the centralized intake process. During FY 2016-2017 Emergency Shelter Grant funds will be utilized to support the following emergency shelters and case management services. Kent County and Grand Rapids CDBG funds will be used to support additional services.

Grand Rapids and MSHDA FY 2016 Emergency Solutions Grants funds will be utilized to support the following transitional shelter operation and/or case management services.

HOMELESS RESPONSE COORDINATION

<u>Agency</u>	<u>Program Activities</u>	<u>Funding</u>	<u>Amount</u>
The Salvation Army Social Services	Housing Assessment Program	MSHDA ESG	\$117,460
The Salvation Army Social Services (Fudiciary)	Financial Assistance Fund	MSHDA ESG	\$ 63,960
The Salvation Army Social Services	Administration	MSHDA ESG	\$ 6,828
The Salvation Army Social Services	Housing Assessment Program	HUD CoC Prog	\$228,488
The Salvation Army Social Services	HMIS	HUD Coc Prog	\$100,000
The Salvation Army Social Services (Fudiciary)	Financial Assistance Fund	GR City ESG	\$234,670
The Salvation Army	Coordinated Assessment	GR City ESG	\$ 60,962
Heart of West Michigan United Way (Fiduciary)	CoC Planning	HUD Coc Prog	\$ 63,000
Fair Housing Center of West MI	Fair Housing Assistance	KCCD	\$ 40,000
Total			\$915,368

EMERGENCY SOLUTIONS GRANT PROGRAMS

<u>Agency</u>	<u>Shelter</u>	<u>Funding</u>	<u>Amount</u>
The Salvation Army	Housing Assessment	GR ESG	\$ 85,000
Community Rebuilders	Scatter Site	KCCD ESG	\$135,464
Inner City Christian Federation	ICCF-RRH	HUD CoC	\$ 80,064
Total			\$300,528

PERMANENT HOUSING PROGRAMS

<u>Agency</u>	<u>Program</u>	<u>Funding</u>	<u>Amount</u>
YWCA	Project HEAL	HUD CoC	\$399,368
Community Rebuilders	Families in Transition (FIT)	HUD CoC	\$760,394
Community Rebuilders	Keys First	HUD CoC	\$820,794

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Community Rebuilders	CoC	KCCD CoC	\$1,393,782
Grand Rapids Housing Commission	Hope Community	HUD CoC	\$159,663
Grand Rapids Housing Commission	HAL I,II,III	HUD CoC	\$366,424
The Salvation Army Social Services	Kindred Program	HUD CoC	\$146,746
Inner City Christian Federation	ICCF-PSH	HUD CoC	\$ 35,379
Genesis	Heron Courtyard	HUD CoC	\$ 33,170
Genesis	Oroquis	HUD CoC	\$ 26,750
Genesis	Kingsbury Place	HUD CoC	\$ 37,450
Dwelling Place	Liz's House	GR ESG	\$ 85,855
Dwelling Place	Heartside-Ferguson	HUD CoC	\$ 63,000
Dwelling Place	Vernebarry Place	HUD CoC	\$116,667
Dwelling Place	Commerce Apartments	HUD CoC	\$204,374
Total			\$4,649,816

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

Action Plan Community Development Response:

Non-housing community development activities are targeted to the thirty-three (33) participating local jurisdictions within Kent County and located within geographic areas which benefit low and moderate income households. Because of the enormous geographic size of this type of program at the county level, Kent County has adopted the program philosophy of allowing the local jurisdictions to program funds to eligible projects, services, and locations within detailed administrative guidelines. This county-wide programmatic approach is implemented within the HUD CDBG objective of "the development of viable urban communities, by providing decent housing and a suitable living environment, and expanding economic opportunities, principally for persons of low and moderate income." Additionally, the local program choices must fall within three (3) operational objectives of benefiting low and moderate income persons, addressing slums and blight, and/or meeting a particularly urgent community development need.

After meeting the program objectives, the local units of government propose projects which fall within the category of:

1. Public Facilities and Improvements
2. Public Services
3. Removal of Slums and Blight on a Spot Basis

These non-housing community development activities, when combined with the housing programs and homeless assistance effort, demonstrate a commitment by Kent County to target program projects and services to low and moderate income populations within a specific geographic area, on a community-wide basis, or for a special population (abused children, elderly persons, battered spouses, homeless persons, severely disabled adults, illiterate persons, migrant farm workers, and persons with HIV/AIDS).

Antipoverty Strategy Response:

The County's goals, programs and policies for reducing the number of poverty-level families are to support programs that help stretch scarce resources for families and individuals living in poverty. The 2015 Health and Human Services Poverty Guideline for a family of four is \$24,300. For a single person, the level is \$11,880. With the minimum wage at \$8.50 an hour, a single person would be able to earn \$17,680 working full-time. To pay no more than thirty percent of their income toward housing (HUD's definition of affordability) they would need a unit costing \$442 or less per month. In Kent County, the fair market rent for a one bedroom apartment is \$690 (Kent County Housing Commission 2016 Payment Standard) which exceeds what people earn working for minimum wage can afford, in particular when they do not get full-time hours. With the fair market rent of a two bedroom apartment at \$854, a one-wage earner household would have to earn an annual wage of \$34,160 or \$16.42 an hour to afford a market rate apartment.

The County utilizes fifteen percent of its annual CDBG entitlement grant to support services in the community which are designed to increase access to basic services for very low income individuals. These services include transportation for the elderly and persons with disabilities, youth services, meals for seniors both home-delivered and at congregate dining sites, and support for senior centers which provide information and referral to seniors. In addition, housing programs offered by the County through the CDBG, HOME and other HUD-funded programs assist low-income individuals either directly with

housing subsidies or through improvements to their living environment. By improving access to services people can gain the tools they need to meet their daily needs and those of their children.

The Kent County Housing Commission addresses alleviation of poverty through its Family Self Sufficiency (FSS) program. Voucher holders voluntarily participate in the FSS program, in which they work with a caseworker to create a personal plan to save money, increase their education and/or job skills, and in some cases purchase a home.

The primary factor that influences the degree of poverty is the ability of a household or individual to generate household or personal income. Private income generation is not a factor that can be directly controlled by Kent County. However, the County does involve itself in programs that have an impact, albeit indirectly, on household or personal income. These programs, and their impacts, are as follows:

Affordable Housing Activities: Kent County utilizes CDBG, HOME, and other funds to undertake housing rehabilitation activities that benefit extremely low-income families and individuals. These housing rehabilitation activities include energy efficient improvements that tend to reduce utility costs and thus increase disposable household income. This means that extremely low-income families and individuals have additional funds to spend on their other needs. In addition, the Kent County Housing Commission is involved in the Housing Choice (Section 8) Voucher Family Self Sufficiency (FSS) and HomeOwnership programs, which are intended to assist families/individuals to obtain a greater degree of self sufficiency and allow extremely low-income families and individuals to obtain better housing at a lower cost, and thus increase the amount of funds available for such families to use in meeting other needs.

Emergency Needs Programs: Kent County residents are eligible to participate in a program, administered by ACSET (Kent and Grand Rapids CAP) and the North Kent Service Center, under which emergency financial payments for shelter, entrance rent, security deposits, rental arrearage, and utility assistance are provided to families and individuals of extremely low income to assist them from becoming homeless. These programs provide strictly limited assistance, to those in the most dire circumstances. The impact tends to provide only short-term relief to those in need, due to funding limitations.

Job Training Partnership Act Activities: Also through ACSET, extremely low-income Kent County residents are screened for and provided employment counseling and training. Such activities are intended to prepare individuals to either enter the job market or increase their skills in order to increase their employment opportunities. The impact of these efforts is intended to provide additional household or personal income, and thus reduce poverty.

Child Care Programs: According to the Kent County Department of Human Services, a total of 692 licensed child care facilities were operating in the Kent County CDBG area in 2014. According to a study of 100 counties in 36 states conducted by researchers at Harvard University, child care tends to be available to children of both affluent and lower-income families, but the child care needs of lower working class and middle class families tend to go unmet. A full spectrum of child care services would tend to promote a reduction in poverty, as it would free up the time needed for single-parents to seek and obtain employment.

In light of the above programs, the anti-poverty strategy of Kent County includes the continued implementation of all activities mentioned above, with additional coordination and some possible limited CDBG funding for public service activities.

The County of Kent supports the anti-poverty efforts of the following agencies:

Kent County Department of Human Services (DHS)

Access of West Michigan

Second Harvest Cleaners

Senior Meals Program, Inc

Dwelling Place of Grand Rapids, Inc

Genesis Non-Profit Housing Corporation

Hope Network

Home Repair Services (HRS) of Kent County

Area Community Services Employment Training (ASCET) Council

State Legislation. On December 29, 2004, Governor Granholm signed into law legislation that will help make affordable housing more attainable to residents. The program will make grants and loans encouraging developers to build as many as 1,000 low- and mixed-income rental and homeowner units each year.

County of Kent

The legislation establishes the Affordable Housing Fund to target the state's most critical housing needs and spend as much as \$25 million each year to expand ownership and rental choices for people with limited incomes.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

Non-homeless Special Needs Response:

Kent County provides, through its Health Department, Community Mental Health Department, and Department of Human Services, a number of programs and activities to serve this population on a county-wide basis. No major changes to the established service-delivery system are envisioned in the 2016-2017 program year, although state and local funding sources continue to be down-sized and the impacts of welfare reform are unclear. Aside from these traditional activities, in 2016-2017, Kent County will attempt to undertake the following:

In order to provide affordable housing opportunities to this population, Kent County has created the Kent County Housing Commission, pursuant to Act 18 of the Michigan Public Acts of 1933, as amended. It would be anticipated that such an agency will take the steps necessary to increase the supply of standard rental units available to house this population and to subsidize the rental rates in order to make such units affordable by means of Housing Choice (Section 8) Vouchers.

Kent County will continue its contractual relationship with the Fair Housing Center of Greater Grand Rapids (FHC), under which Kent County provides funds to the FHC to affirmatively further and promote fair housing for persons with special needs.

Kent County will initiate research through HUD, MSHDA, and RHS to identify potential sources of funding for new housing construction to meet the identified needs of this population.

Category of Residents

Persons with special needs are typically persons (or households) with a serious health issue which undermines their ability to work and live with independence. Persons with special needs are typically mentally ill, physically handicapped or developmentally disabled. Others, such as frail elderly, substance abusers, and persons with AIDS, may also need supportive housing assistance.

Support to Other Entities

Kent County will support efforts on the part of other entities to apply for funding programs that will result in a variety of affordable rental housing choices for very low income persons with special needs. Individual applications and proposals will be reviewed to insure consistency with the goals and objectives established in the Extended Six-Year Consolidated Strategy and Plan, and to insure consistency with other county and/or local governmental unit goals and objectives for development. Typical programs that Kent County will likely support, that work toward a variety of affordable rental choices for very low income persons with special needs, are the Section 202 program (for the elderly), the Section 811 program (for the physically handicapped and developmentally disabled), projects utilizing Low Income Housing Tax Credits, and an increase in the Housing Choice (Section 8) Voucher program (for all special needs categories).

Leveraging

The programs identified under this priority will not leverage other investments. The only programs having a matching requirement are the Continuum of Care (COC) Program and the Emergency Solutions Grant (ESG) Program, for which Kent County has obtained commitments for the required public service support activities from the appropriate local agencies that will deliver such services.

One-Year Goals

As previously stated, Kent County will continue to apply for additional Housing Choice (Section 8) Vouchers that will provide a variety of affordable housing choices for very low income persons with special needs.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

Action Plan HOPWA Response:

The HOPWA program activities in Kent County are administered by the Kent County Health Department on behalf of HOPWA Services Providers of West Central Michigan. The funds are dispersed from the Michigan Department of Community Health, Division of Community Living. Kent County will distribute 22 Housing Certificates annually managed by St. Mary's Mercy Medical Center's McAuley Health Center. McAuley will also perform Direct Assistance and Case Management functions for HOPWA recipients in Kent County.

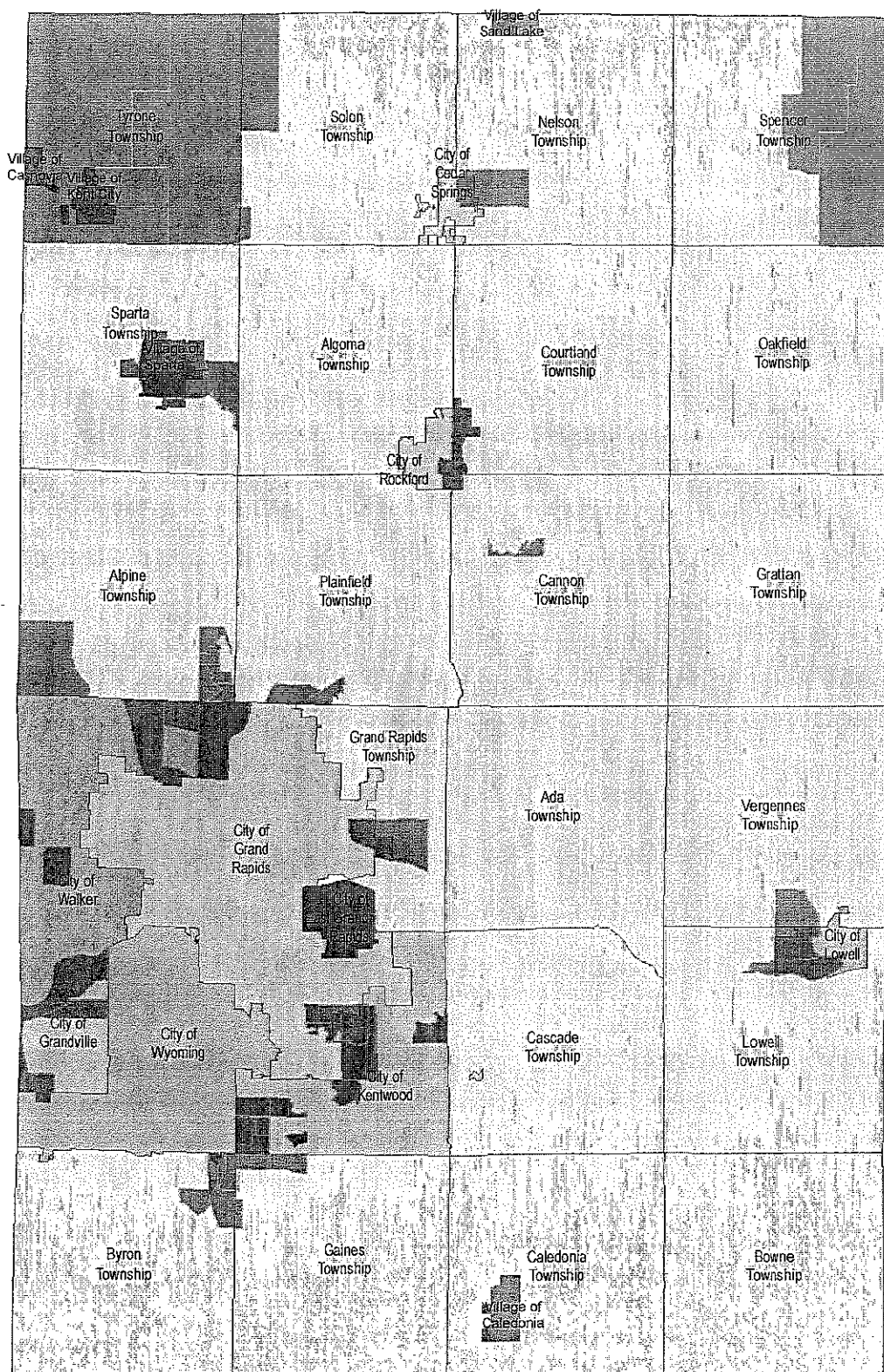
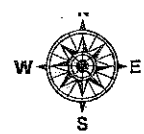
Although Kent County does not administer HOPWA funds directly, our Continuum of Care funds provide some housing burden relief and supportive services for individuals living with HIV/Aids, including Community Rebuilders and Dwelling Place.

DRAFT



Kent County Target Areas 2014

Community Development Block Grant Program



Annual Action Plan Review Checklist

Grantee: Kent County

Program Year: July 1, 2016

If a Consortia, list participating communities and asterisk the lead agency:

2. Annual Action Plan covers the following programs:

CDBG X HOME X ESG X HOPWA

Date plan received: May 2, 2016

Date plan would be automatically approved (45 days): June 30, 2016

Date plan disapproved (in part or in its entirety):

Use of HUD 2020 for project descriptions/Zip File?: Yes No X

List of projects identified on maps (optional)? Yes No X

Is an Executive Summary attached (optional)? Yes No X

ACTION PLAN (91.220)

1. Has the Standard 424 Form for the applicable programs been included with the correct dollar allocations and signed by the appropriate official?
Yes ☒ No ☐
2. Is the DUNS number listed?
Yes ☒ No ☐
3. Did the grantee describe the geographic areas of the jurisdiction (including areas of low income and/or racial/minority concentration) in which assistance will be directed during the next year.
Yes ☒ No ☐ Pg. 2,4,20
4. Did the grantee describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
Yes ☒ No ☐ Pg. 2

RESOURCES

1. Has the grantee described the Federal Resources, and private and non-Federal public resources expected to be available to address priority needs and specific objectives identified in the plan?
Yes ☒ No ☐ Verification found on page 1
2. Did the grantee describe how HOME and/or ESG matching requirements will be satisfied?
Yes ☒ No ☐ N/A ☐ Verification found on page 2

ACTIVITIES 91.220(D)

1.
 - a) Has the grantee described the CDBG funded activities for the program year in a complete manner? **See Section B**
Yes ☒ No ☐ Pg. 2
 - b) Has the grantee described the HOME funded activities for the program year in a complete manner? **See Section B**
Yes ☒ No ☐ Pg. 2 & 3
 - c) Has the grantee described the ESG funded activities for the program year in a complete manner? **See Section B**
Yes ☒ No ☐ N/A

d) Has the grantee described the HOPWA funded activities for the program year in a complete manner? **See Table 3C**

Yes ☐ No ☐ N/A ☒

2. Does the action plan contain a summary of priorities and specific annual objectives that will be addressed during the program year?

Yes ☒ No ☐ Verification found on page 2

Note: The Jurisdiction should use summary of annual objectives as identified in Table 3A of the Consolidated Plan.

3. Do the proposed activities correspond to the priority needs identified/local specific objectives listed in the Consolidated Plan?

Yes ☒ No ☐ Verification found on page 2

Note: The Jurisdiction should use priority needs as identified in Table 2A and 2B of the Consolidated Plan.

4. Are the proposed activities identified in sufficient detail, including the number and type of families that will benefit from the proposed activities and locations, so that citizens know the degree to which they may be affected?

Yes ☒ No ☐ Verification found on page Project Status Sheets

Outcomes 91.220(e)

1. Does the action plan contain outcome measures for activities in accordance with the Federal Register Notice dated March 7, 2006?

Yes ☐ No ☐ Verification found on page _____

Expenditure Limits

1. Has the grantee exceeded the 20% administrative cap for CDBG?

Yes ☐ No ☒

2. Has the grantee exceeded the 15% public service cap for CDBG?

Yes ☐ No ☒

3. Has the grantee exceeded the 10% administrative cap for HOME?

Yes ☐ No ☒

4. Has the grantee met the 15% CHDO set-aside for HOME?

Yes ☒ No ☐

5. Has the grantee exceeded the 3% administrative cap for HOPWA or the 7% administrative cap by project sponsors under HOPWA?

Yes ☐ No ☐ N/A ☒

GEOGRAPHIC DISTRIBUTION 91.220(f)

1. Did the grantee include a narrative, maps, or tables that identify the geographic areas in which it will direct assistance?

Yes ☒ No ☐ Verification found on page 5

2. Does the grantee provide a description of the areas, including areas of minority concentration, in which it will direct funds?

Yes ☒ No ☐ Verification found on page 5

3. Does the grantee provide the rationale for the priorities for allocating investment geographically for each program, including within the metropolitan area (or a State's service area) for the HOPWA program? N/A

Yes ☐ No ☐ Verification found on N/A

If no, explain the basis for the no response:

4. Did the grantee estimate the percentage of funds it plans to dedicate to target areas?

Yes ☐ No ☐ Verification found on page N/A

AFFORDABLE HOUSING GOALS 91.220(g)

1. Does the action plan specify on-year goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing units using funds made available to the jurisdiction?

Yes ☒ No ☐ Verification found on page 11,12,13

Note: The Jurisdiction should use housing summary of goals as identified in Table 3B of the Consolidated Plan.

2. Does the action plan specify on-year goals for the number of households to be provided affordable housing units through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of exiting units using funds made available to the jurisdiction?

Yes ☒ No ☐ Verification found on page 12

Note: The Jurisdiction should use housing summary of goals as identified in Table 3B of the Consolidated Plan.

PUBLIC HOUSING 91.220(h)

1. Does the action plan include actions that address the following, *if applicable*:

- needs of public housing, Yes ☐ No ☐
- public housing improvements and resident initiatives, Yes ☐ No ☐
- assist troubled public housing agencies. Yes ☐ No ☐

HOMELESS AND OTHER SPECIAL NEEDS ACTIVITIES 91.220(i)

1. Have homeless prevention activities been proposed?

Yes ☒ No ☐ Verification found on page 17, 18

2. Have emergency shelter, transitional housing, programs to assist in the transition to permanent housing and independent living been proposed?

Yes ☒ No ☐ Verification found on page 18

3. Are supportive housing activities being undertaken to address the priority housing needs of persons who are not homeless (elderly, frail elderly, persons with disabilities, person with HIV/AIDS, persons with alcohol or other substance abuse problems)?

Yes ☒ No ☐ Verification found on page 13, 18

4. Have specific action steps to end chronic homelessness been identified?

Yes ☒ No ☐ Verification found on page 17

OTHER ACTIONS 91.220(k)

1. Does the Action Plan include other proposed actions which will address the following, *if applicable*:

- foster and maintain affordable housing, Yes ☒ No ☐
- public housing improvements and resident initiatives, Yes ☐ No ☐
- evaluation and reduction of lead-based hazards, Yes ☒ No ☐

- reducing the number of persons below the poverty line, Yes ☒ No ☐ Pg. 19
- developing institutional structures/enhancing coordination between housing and services agencies, Yes ☒ No ☐ Pg. 19, 20

PROGRAM SPECIFIC REQUIREMENTS 91.220(I)

1. CDBG

- a) Does the total amount of funds allocated equal the amount of the grant plus program income and carryover funds? Yes ☒ No ☐ Pg. 2 & 5
- b) Does the action plan identify the amount of CDBG funds that will be used for activities that benefit persons of low- and moderate-income? Yes ☒ No ☐ Pg. 5

1. HOME

- a) Did grantee (PJ) describe other forms of investment? **See Section 92.205**
Yes ☒ No ☐ N/A ☐ Pg. 5
If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254?
Yes ☒ No ☐ N/A ☐ Pg. 15, 16
- b) If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, did they state its refinancing guidelines required under 24 CFR 92.206(b)?
Yes ☐ No ☐ N/A ☒
- c) Resale Provisions -- For homeownership activities, did the participating jurisdiction must describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).
Yes ☒ No ☐ Pg. 15, 16
- e) HOME Tenant-Based Rental Assistance -- Did the participating jurisdiction must describe the local market conditions that led to the use of a HOME funds for tenant based rental assistance program?
Yes ☐ No ☐ N/A ☒
- a. If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.
- e) If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), did the jurisdiction describe these forms of investment?
Yes ☐ No ☐ N/A ☒
- f) Did the jurisdiction describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units?
Yes ☐ No ☐ N/A ☒
- g) Did the jurisdiction describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction?
Yes ☒ No ☐ Pg. 7, 8, 9
- h) If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, did it state its financing guidelines required under 24 CFR 92.206(b)?
Yes ☐ No ☐ N/A ☒

1. American Dream Downpayment Initiative N/A
 - a. If the jurisdiction planned to use American Dream Downpayment Initiative (ADDI) funds to increase access to homeownership, did it provide the following information:
 - i. description of the planned use of the ADDI funds?
Yes ☐ No ☐
 - ii. plan for conducting targeted outreach to residents and tenants of public and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide downpayment assistance for such residents, tenants, and families? Yes ☐ No ☐
 - iii. a description of the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers?
Yes ☐ No ☐

4. HOPWA N/A

- a) Does the action plan specify on-year goals for the number of low-income households to be provided affordable housing using HOPWA funds for short-term rent, mortgage, and utility payments to prevent homelessness; tenant-based rental assistance, units provided in housing facilities operated with HOPWA funds? Yes ☐ No ☐ Verification found on page _____
- b) Does the action plan identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)?
Yes ☐ No ☐ Verification found on page _____

MONITORING (91.230)

1. Does the grantee describe the standards and procedures that it will use to monitor activities carried out in furtherance of the plan?
Yes ☒ No ☐ Verification found on page 10
2. Does the Plan describe actions to be taken by the grantee to monitor its performance in meeting its goals and objectives set forth in it's Consolidated Plan?
Yes ☒ No ☐ Verification found on page 10, 11
3. Does the Plan describe steps/actions being taken to insure compliance with program requirements, including requirements involving the timeliness of expenditures?
Yes ☒ No ☐ Verification found on page 10, 11

Note: If timeliness of expenditures is an issue, please make sure the grant award letter includes language regarding appropriate actions the grantee should take to remedy this problem.

4. Does the Plan describe steps/actions it will use to ensure long-term compliance with housing codes, including any actions or on-site inspections it plans to undertake during the program year?
Yes ☒ No ☐ Verification found on page 10, 11

Note: For example, a HOME program grantee should identify steps it will take to review affordable housing projects it has funded to insure compliance with all HOME program requirements.

5. Does the Plan describe actions to be taken by the grantee to monitor its subrecipients, (including sponsors or administering agents)?

Yes ☒ No ☐ Verification found on page 10, 11

HUD APPROVAL ACTION

The regulations at Section 91.500(b) state that HUD will approve or disapprove a plan or a portion of a plan for the three following reasons:

- 1) if it is inconsistent with the purposes of NAHA;
- 2) if it is substantially incomplete; and/or
- 3) if certifications are not satisfactory to the Secretary
- 4) if does not include description of manner in which unit of local government or state will provide financial or other assistance to troubled public housing agencies.

Please use the following to determine approval or disapproval:

CONSISTENCY WITH NAHA

1. Is the Plan inconsistent with the purposes of NAHA?

Yes ☐ No ☐

If the Plan is inconsistent with NAHA, set forth the basis of that determination by using the following as a guide:

- Does the Plan provide assistance to help families, not owning a home, to save for a down-payment for the purchase of a home?
- Does the Plan provide assistance to retain, where feasible, as housing affordable to low income families, those dwelling units provided for such purpose with federal assistance?
- Does the Plan provide assistance to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of housing affordable to low- and moderate-income families?
- Does the Plan provide assistance to expand and improve federal rental assistance for very low-income families?
- Does the Plan provide assistance to increase the supply of supportive housing, which combines structural features and services needed to enable persons with special needs to live with dignity and independence?

SUBSTANTIALLY INCOMPLETE

1. Is the Plan (including any corrective actions taken at HUD's request during HUD's review of the plan) substantially incomplete?

Yes ☐ No ☐

If the Plan is substantially incomplete, set forth the basis of that determination by using the following as a guide:

- The Plan was developed without the required citizen participation or the required consultation.
- The Plan fails to satisfy all the required elements in the regulations.

AFFIRMATIVELY FURTHERING FAIR HOUSING

1. Is the Certification to Affirmatively Further Fair Housing satisfactory to the Secretary?

Yes ☐ No ☐

If the Certification is not satisfactory, set forth the basis of that determination by using the following as a guide:

- Disregard of regulatory requirements to conduct an analysis of impediments to fair housing choice, take appropriate actions to address identified impediments, and maintain adequate records on the steps taken to affirmatively further fair housing in the jurisdiction.
- Lack of action taken on outstanding findings regarding performance under affirmatively furthering fair housing certification requirements of the Consolidated Plan or the Community Development Block Grant Program.

CERTIFICATIONS (91.225)

1. Are the general and specific certifications for each program funded complete and accurate, where applicable:

Note: Consortia, please refer to 91.425
State, please refer to 91.325

General:

- | | | |
|--------------------------------------------|-----------------------------------------|-----------------------------|
| (1) Affirmatively furthering fair housing: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Anti-displacement and relocation Plan: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Drug-free workplace: | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) Anti-lobbying | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (5) Authority of Jurisdiction | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (6) Consistency with Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (7) Acquisition and relocation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (8) Section 3 | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

CDBG:**

- | | | |
|-------------------------------------------------|-----------------------------------------|-----------------------------|
| (1) Citizen Participation | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Community Development Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Following Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) Use of funds | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (5) Excessive Force | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (6) Compliance with anti-discrimination law | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (7) Compliance with lead-based paint procedures | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (8) Compliance with laws | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

ESG:

- | | | |
|-----------------------------------------|-----------------------------------------|-----------------------------|
| (1) Not less than 10-years | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Not less than 3-years | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Service Provision | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (4) Safe and Sanitary | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (5) Supportive Services | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (6) Match Requirements | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (7) Confidentiality | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (8) Employing or involving the homeless | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (9) Consolidated Plan compliance | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (10) Discharge policy | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

HOME

- | | | |
|-------------------------------|-----------------------------------------|-----------------------------|
| (1) TBRA is consistent w/Plan | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
|-------------------------------|-----------------------------------------|-----------------------------|

- | | | |
|----------------------------------|-----------------------------------------|-----------------------------|
| (2) Use for eligible activities | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) Monitor for subsidy layering | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

HOPWA:

- | | | |
|-----------------------------|------------------------------|-----------------------------|
| (1) Meet urgent needs | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) 10- or 3-year operation | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

***The certification period for the CDBG program's overall benefit requirements must be consistent with the period certified in the prior certification.*

Based on my review of the Plan against the regulations, I have determined the Plan is:

Approved ☐

Disapproved ☐

Date plan disapproved (in part or in its entirety):

Note: Written notification of disapproval must be communicated to the applicant in accordance with 24 CFR 91.500(c). **If disapproved**, provide documentation including dates and times on incompleteness determination, and discussions with grantee and Headquarters:

Reviewed by _____

DATE: _____

Program Manager _____

DATE: _____

CPD Director _____

DATE: _____